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**Statements of the Lehigh Valley and Reading Ozone Stakeholder Working Group Tier 2
Drafting Committee for the counties of Lehigh, Northampton, and Berks**

*Submitted by: David Arnold, US EPA, Region III
Brooks Mountcastle (alternate) & Jason Rash, Clean Air Council
Ellen Shapiro, Lyondell Chemical Company*

OPTION A

The Lehigh Valley and Reading Ozone Stakeholder Working Group finds that:

reducing vehicle emissions will help the Reading and Lehigh Valley areas meet the national ambient air quality standards (NAAQS) for ozone and particulate matter;

and that technology would be available to meet such standards cost effectively;

and sport utility vehicles, minivans, and pick-up trucks, which typically have higher emissions than passenger cars, make up a nearly half of all passenger vehicles sold nationally;

the Lehigh Valley and Reading areas have high background ozone levels that are partly attributable to transported ozone and ozone precursors from mobile and stationary sources;

that cleaner fuels and tighter vehicle emission standards can significantly reduce ozone precursor emissions from motor vehicles in the three county area;

We therefore endorse and support the principles of EPA's proposed Tier 2 rulemaking (FR, May 1999, Docket No. A-97-10) that EPA expects to implement beginning in 2004, including its gasoline sulfur control program. We further endorse and support EPA's efforts to provide flexibility to the auto and oil industries, such as averaging of the standards, allowing extra time for heavier vehicles (6000 and 8500 lbs.) and smaller refiners to meet their respective standards and providing market-based incentive programs for both industries.

Alternatively, if the proposed emission control program is restructured, we endorse a federal light duty vehicle control program and cleaner fuels program that would provide emissions reductions that are equivalent to those provided by the proposed rulemaking.

Should the EPA fail to adopt a Tier 2 program beginning in 2004, the Lehigh Valley and Reading Ozone Stakeholder Working Group recommends that the Commonwealth of Pennsylvania implement its already adopted California Low Emission Vehicle Program along with a cleaner fuels program.

Option B

The Lehigh Valley and Reading Ozone Stakeholder Working Group endorses and recommends

that the PA Department of Environmental Protection encourage EPA to adopt a final Tier 2 rulemaking for vehicle emission standards and fuel sulfur levels that would result in equivalent emission reductions in Pennsylvania as the proposed Tier 2 rule issued in May 1999.

If EPA fails to issue such a regulation by July 1, 2000, or if the final rule is challenged in court, preventing its implementation by 2004, then we recommend that the PA Department of Environmental Protection reduce mobile source emissions either by adopting a cleaner fuels program alone or by implementing the California Low Emission Vehicle program along with a cleaner fuels component.

“Cleaner fuels” means any or all of the following: sulfur at or below 30 ppm, distillation index (DI) capped at 1150, combustion chamber deposits (CCD) control for gasoline, or near-zero sulfur for diesel, or any other limits as recommended by automakers.

DRAFT

Statement of the Lehigh Valley and Reading Ozone Stakeholder Working Group Supporting Tier II for the counties of Lehigh, Northampton, and Berks:

OPTION A

The United States Environmental Protection Agency has concluded that more stringent vehicle standards are needed to meet the ozone and particulate matter air quality standards; and that technology would be available to meet such standards cost effectively; and because sport utility vehicles, minivans, and pick-up trucks make up nearly half of all passenger vehicles sold, and typically have higher emissions than cars; the Lehigh Valley and Reading Ozone Stakeholder Working Group endorses and recommends that EPA adopt the proposed Tier Two tailpipe emissions standards as proposed in the Federal Register in May 1999 (Docket No. A-97-10).

These standards would become effective beginning in 2004 and would apply to both cars and light-duty trucks, including sport utility vehicles, minivans, and pick-up trucks. In addition to the tighter tailpipe standards, the proposal would also reduce average sulfur levels in gasoline. As part of these new standards, the Lehigh Valley and Reading Ozone Stakeholder Working Group endorses the flexibility included in the proposed regulation: 1) allowing averaging to meet both the car emission and gasoline sulfur standards; 2) allowing extra time as stated in the regulation for larger vehicles between 6000 and 8500 pounds and smaller refiners to meet their respective standards; and 3) allowing for a market-based credit trading-and-banking system for both industries.

Alternatively, if the proposed emission control program is restructured, the Lehigh Valley and Reading Ozone Stakeholder Working Group endorses a program that would result in equivalent Tier Two reductions.

Should the EPA fail to adopt a Tier Two program for implementation in 2004, the Lehigh Valley and Reading Ozone Stakeholder Working Group recommends that the Commonwealth of Pennsylvania adopt and implement the California Low Emission Vehicle Program as stated in Pennsylvania's regulations.

OPTION 1

The Reading-Lehigh Valley Ozone Stakeholders Group endorses and recommends that the Pennsylvania DEP encourage EPA to adopt a final Tier 2 rulemaking for tailpipe emission standards and fuel sulfur levels that would result in comparable emission reductions in Pennsylvania as the proposed Tier 2 rule issued in May 1999. For purposes of this recommendation, Acomparable@ means emission reductions that are within □ 10% of the total emission reductions estimated for the program between 2004 and 2007, as calculated using a model that is at least as advanced as the model used to estimate emissions in the Tier 2 proposed rule or better (e.g., MOBILE6 but not MOBILE5b).

If EPA fails to issue a regulation by July 1, 2000, that meets these criteria, or if EPA issues such a regulation but the rulemaking is litigated to prevent its implementation by 2004, then the Stakeholders recommend that Pennsylvania DEP seek to reduce emissions from mobile sources by an alternative program, either through a cleaner fuels program or by implementing the California vehicle emission program along with a cleaner fuels component to ensure that the vehicles to be introduced in 2004 will produce the lower emissions for which they will be designed.

DRAFT

Statement of the Lehigh Valley and Reading Ozone Stakeholder Working Group Supporting Tier II for the counties of Lehigh, Northampton, and Berks: Proposed Tier Two Federal Motor Vehicle and Fuel Standards

Lehigh Valley and Reading Ozone Stakeholder Working Group Finds:

The United States Environmental Protection Agency has concluded that more stringent vehicle standards are needed to meet the ozone and particulate matter air quality standards;

and that technology would be available to meet such standards cost effectively;

and because sport utility vehicles, minivans, and pick-up trucks make up nearly half of all passenger vehicles sold, and typically have higher emissions than cars;

the Lehigh Valley and Reading Ozone Stakeholder Working Group endorses and recommends that EPA adopt the proposed Tier Two tailpipe emissions standards as proposed in the Federal Register in May 1999 (Docket No. A-97-10), and June (Docket No. ???) of 1999.

These standards would become effective beginning in 2004 and would apply to both cars and light-duty trucks, including sport utility vehicles, minivans, and pick-up trucks. In addition to the tighter tailpipe standards, the proposal would also reduce average sulfur levels in gasoline. As part of these new standards, the Lehigh Valley and Reading Ozone Stakeholder Working Group endorses the flexibility included in the proposed regulation: 1) allowing averaging to meet both the car emission and gasoline sulfur standards; 2) allowing extra time as stated in the regulation for larger vehicles between 6000 and 8500 pounds and smaller refiners to meet their respective standards; and 3) allowing for a market-based credit trading-and-banking system for both industries.

Alternatively, if the proposed emission control program is restructured, the Lehigh Valley and Reading Ozone Stakeholder Working Group endorses a program that would result in equivalent Tier Two reductions.

Optional:

Should the EPA fail to adopt a Tier Two program for implementation in 2004, the Lehigh Valley and Reading Ozone Stakeholder Working Group recommends that the Commonwealth of Pennsylvania adopt and implement a program that is equivalent to the California Low Emission Vehicle Program. ~~the California Low Emission Vehicle Program~~ as stated in Pennsylvania's regulations.

Proposed Tier Two Federal Motor Vehicle and Fuel Standards

The Working Group endorses and recommends that EPA adopt the proposed Tier Two tailpipe emissions standards as proposed in the Federal Register in May and June of 1999. These standards would become effective beginning in 2004 and would apply to both cars and light-duty trucks. In addition to the tighter tailpipe standards, the proposal would also reduce average sulfur levels in gasoline. As part of these new standards, the Working Group endorses the flexibility included in the proposed regulation: 1) allowing averaging to meet both the car emission and gasoline sulfur standards; 2) allowing extra time for larger vehicles between 6000 and 8500 pounds and smaller refiners to meet their respective standards; and 3) allowing for a market-based credit trading-and-banking system for both industries. Alternatively, if the proposed emission control program is restructured, the Working Group endorses a program that would result in equivalent Tier Two reductions.

Optional:

Should the EPA fail to adopt a Tier Two program, the Working Group recommends that the Commonwealth of Pennsylvania adopt a program that is equivalent to the California Low Emission Vehicle Program.

Alternative Proposed Recommendation

The Reading-Lehigh Valley Ozone Stakeholders Group endorses and recommends that the Pennsylvania DEP encourage EPA to adopt a final Tier 2 rulemaking for tailpipe emission standards and fuel sulfur levels that would result in comparable emission reductions in Pennsylvania as the proposed Tier 2 rule issued in May 1999. For purposes of this recommendation, "comparable" means emission reductions that are within $\pm 10\%$ of the total emission reductions estimated for the program between 2004 and 2007, as calculated using a model that is at least as advanced as the model used to estimate emissions in the Tier 2 proposed rule or better (e.g., MOBILE6 but not MOBILE5b).

If EPA fails to issue a regulation by July 1, 2000, that meets these criteria, or if EPA issues such a regulation but the rulemaking is litigated to prevent its implementation by 2004, then the Stakeholders recommend that Pennsylvania DEP seek to reduce emissions from mobile sources by an alternative program, either through a cleaner fuels program or by implementing the California vehicle emission program along with a cleaner fuels component to ensure that the vehicles to be introduced in 2004 will produce the lower emissions for which they will be designed.

